



U.S. Department of Energy

**Office of River Protection**

P.O. Box 450  
Richland, Washington 99352

0059511

03-TOD-032

**MAY 27 2003**

Mr. Michael A. Wilson, Program Manager  
Nuclear Waste Program  
State of Washington  
Department of Ecology  
1315 W. Fourth Avenue  
Kennewick, Washington 99336

**RECEIVED**  
MAY 29 2003

**EDMC**

Dear Mr. Wilson:

**REQUEST FOR DEFERRAL OF THE ANNUAL INTEGRITY ASSESSMENT FOR A  
DIRECT BURIED TRANSFER LINE**

This letter requests the deferral of annual integrity assessment for a direct-buried transfer line. 40 CFR Subpart J, 265.193(i)(2) requires the annual integrity assessment of transfer lines that do not have compliant secondary containment. Tank Farms uses a direct-buried transfer line for the interim stabilization of 241-SX-102 and must do an annual leak test to comply with the above regulation. The U.S. Department of Energy, Office of River Protection (ORP) has previously requested and received, the State of Washington, Department of Ecology (Ecology) concurrence to defer an annual integrity test of a direct-buried transfer line. In July 2000, ORP requested and received concurrence to defer the annual test of a direct buried line (SL-103) in 241-U Tank Farm for 90 days.

A deferral is requested for the annual leak test of transfer line SL-117 that connects the 241-SX-A Valve Pit with the 241-S-C Valve Pit and is used for the transfer of 241-SX-102. SX-102 is currently pumping at about 0.3 gallons of liquid waste per minute. A deferral of 135 days is needed to allow the continued pumping of the 241-SX-102 to minimize negative impacts on the Consent Decree September 30, 2003, milestone. To perform the leak test at this time will require the shutdown of the saltwells in the 241-S and 241-SX complex for about one week. The 241-S tank farm also flows through the 241-S-C Valve Pit. The leak test is due on May 28, 2003.

Transfer line SL-117 was last leak tested on May 28, 2002. During the transfer of waste from 241-SX-102, two methods are used to verify the integrity of the transfer line: 1) a soil radiation survey is performed every 12 hours by survey of the transfer line route, and 2) Material Balance Discrepancy (MBD) is calculated between 241-SX-101 (sending tank) and 241-SY-102 (receiving tank) every six hours. MBD calculations and transfer line surveys during the past year indicate that transfer line SL-117 has maintained its integrity and provides assurance of line integrity.

Your concurrence with the deferral of the annual integrity assessment, to October 1, 2003, of SL-117 is requested.


Michael A. Wilson  
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If you have any questions, please contact me, or your staff may contact Andrew Stevens, Tank Farms Operations Division, (509) 376-8235.

Sincerely,



James E. Rasmussen, Director  
Environmental Division

TOD:AJS

cc: W. T. Dixon, CHG  
S. B. Fowler, CHG  
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